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Mr. Harold B. Igdaloff, President
Sungro Chemicals, Inc.
P.O. Box 24632
Los Angeles, CA 90024

Dear Mr. Igdaloff:

Subject: Label Revision - Change Instruction to Use on Pets
to Use on Dogs
PERM II
EPA Registration No. 11474-71
Your Amended Application Dated June 24, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. To protect against repeated skin exposure, add a statement to wear gloves (mitts) when treating pets since directions state to "fluff the hair so that the spray will penetrate to the skin."
2. Add the statement "Do not use this or any other pesticide on sick, old, or debilitated pets."
3. Revise the Precautionary Statement as follows:

Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed or food stuffs. Remove pets and birds and cover fish aquaria before space spraying or surface applications. Do not use on humans. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

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R:50727:Heyward:LR-3:KENCO:2/9/89:3/27/89:rw:jh:de

CONCURRENCES

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293
-2-

4. Under "bedbugs," add the statement "Allow all treated articles to thoroughly dry before use."

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Avoid contamination of feed and foodstuffs. Remove pets and birds, and cover fish aquaria before indoor spraying or surface applications.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink one to two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove affected person to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. "Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters."

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

SHAKE WELL BEFORE USE

INDOOR APPLICATION

SURFACE SPRAYING: To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, confused flour beetles, rust red flour beetles, sawtoothed grain beetles, spider beetles, cigarette beetles, drugstore beetles, mealworms, grain mites and caddisflies: direct the spray into hiding places, cracks and crevices, and behind shelves and drawers. For silverfish, spray bookcases. For ants, spray trails, nests and points of entry.

To control carpet beetles: Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving. Repeat treatment as needed.

To control bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, mouldings and floors. Repeat treatment as needed.

To control fleas and ticks (adults and larvae): Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, mouldings, window and door frames, and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as needed.

SUNGRO PERM II

A Concentrated PERMANONE* Stable Emulsion

Ready-to-Use

Effective, Fast-Acting Insecticide

For Use Outdoors, and in Homes. For Control of Fleas, Brown Dog Ticks and Lice On Premises and On Pets

Apply With Supplied Sprayer

ACTIVE INGREDIENT:

**Permethrin 0.50%

INERT INGREDIENTS

99.50%

*PERMANONE is a registered trademark of Fairfield American Corporation.

** (3-phenoxyphenyl) methyl (+) cis/trans 3-(2,2-dichloro-ethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+) cis and max. 65% (+) trans.

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional Precautionary Statements

EPA Reg. No. 11474-71

EPA Est. No. 11474CA01

Manufactured by:
SUNGRO CHEMICALS, INC.
P.O. Box 24632 Los Angeles, Ca. 90024

NET CONTENTS _____ QTS.

To control clothes moths, storage, brush thoroughly if possible. Apply *sprays to bureaus and other storage joints and crevices. *Treated lightly, keeping fabric to avoid staining. To kill lice and louse eggs, test for possible staining, drying, then proceed to from a distance of 8 to and parts of bedding, it cannot be either laundered or articles to dry thoroughly.

ON PETS: To control the tail, moving the dispart animal's entire body is body. While spraying, penetrate to the skin. Do not spray into eyes or Repeat as necessary.

NOTE: Not recommended for use on animals less than 6 weeks old.

OUTDOOR APPLICATION FOR CONTROL OF GARDEN PESTS: dahlias, asters and other hit by spray as well as spiders, red mites and leaf beetles. May be used on plants, azaleas, begonias, camellias, delphiniums, dogwoods, geraniums, crassula, g. marigolds, rhododendrons, stocks, wandering Jews and Effective when used as spider and red mites, beetles, pavement ants, etc. When spraying plants, Use sweeping motion. foliage, young plants and when temperatures exceed 85°F, insects directly whenever pests occur.

STORAGE AND DISPOSAL: Do not reuse layers of newspaper and d

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